

**UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE: Henry Rivera Murillo Debtor	BK NO. 17-04443 JJT
HomeBridge Financial Services, Inc. Movant	Chapter 13
vs.	Hearing Date: No Date Set
Henry Rivera Murillo Respondent	

**OBJECTION OF HOMEBRIDGE FINANCIAL SERVICES, INC.
TO CONFIRMATION OF CHAPTER 13 PLAN**

HomeBridge Financial Services, Inc. (hereinafter Secured Creditor), objects to confirmation of Debtor's Chapter 13 plan and asserts in support of its Objection as follows:

1. Secured Creditor's claim is secured by a mortgage on Debtor's property at 2690 Long Pond Road, f/k/a 5103 Long Pond Road, Tobyhanna, PA.
2. Arrears are estimated to be \$33,642.74, as will be shown on the Proof of claim that will be filed by the Bar date established by the courts.
3. Debtor's Plan proposes to cure the mortgage arrears through a loan modification to be secured within one year.
4. Secured Creditor objects to the proposed time for securing the loan modification as being excessive.

WHEREFORE, the Secured Creditor, HomeBridge Financial Services, Inc. , prays that the Court deny confirmation of the Debtor's Plan.

Respectfully submitted,

Date: February 21, 2018

By: /s/ James C. Warmbrodt
James C. Warmbrodt, Esquire
jwarmbrodt@kmlawgroup.com
KML Law Group, P.C.
BNY Mellon Independence Center
701 Market Street, Suite 5000
Philadelphia, PA 19106
215-627-1322
Attorney for Movant/Applicant